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April 3, 2023

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Via ECF

Magistrate Judge Barbara Moses Southern District of New York 500 Pearl Avenue New York, NY 10007

MEMO ENDORSED

Re:

Janine Henriquez v. The Salvation Army,

Index No.: 22-cv-10226 (JPC)

File No.: 7300-1043

Dear Judge Moses:

We represent defendant, The Salvation Army, and write jointly with the plaintiff's counsel to request an adjournment of the Initial Conference scheduled for May 2, 2023.

The basis for this request is that counsel have checked their respective schedules and have conflicts. The undersigned is out of the country on May 2, 2023, returning on May 7, 2023. Plaintiff's counsel commences a trial on May 8, 2023. The parties, therefore, respectfully request that the Initial Conference be adjourned to a later date. Parties are available on May 31, 2023, June 1, 2023, and June 2, 2023, if any of those dates are convenient for the Court.

This is the second request for an adjournment of the Initial Conference. The first request was made because the case was referred to mediation through the Court's Mediation Office. This request does not affect any other scheduled dates.

We thank the Court for its time and consideration.

Application GRANTED. The Initial Case Management Conference is now scheduled for May 31, 2023, at 10:00 a.m. The parties shall file their Pre-Conference Statement no later than May 24, 2023. SO ORDERED.

Barbara Moses

United States Magistrate Judge

April 4, 2023

Respectfully Submitted, FRENCH & CASEY, LLP

/s/ Elizabeth Kimundi

Elizabeth K. Kimundi